

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

| | | |
|------------------------|---|--------------------------|
| LECINDA ZIMMERMAN, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 5:18-cv-00521-C |
| |) | |
| GENERAL MOTORS LLC and |) | |
| UTILITY TRAILER |) | |
| MANUFACTURING COMPANY, |) | |
| |) | |
| Defendants. |) | |

**JOINT MOTION FOR AGREED ORDER TO RELEASE
MEDICAL EXAMINER’S FILE ON KAYLYN GATLIN, DECEASED**

Plaintiff Lecinda Zimmerman and Defendants General Motors LLC and Utility Trailer Manufacturing Company, pursuant to Okla. Stat. tit. 63, §§ 939 and 949, jointly move this Court to enter an Agreed Order authorizing and directing the Office of the Chief Medical Examiner for the State of Oklahoma to release and deliver to both Plaintiff’s counsel and Defendants’ counsel, and to permit inspection and copying of, all documents in the Medical Examiner’s Case File – including, but not limited to, an allocation of the tissue and blood samples, recuts of the microscopic slides, photographs, and videos, if applicable, concerning Kaylyn Gatlin, deceased, collected following her death on or about September 1, 2017, in Blaine County, State of Oklahoma.

The parties represent to the Court that the Medical Examiner’s report has been completed and that the documents in the Medical Examiner’s Case File are necessary for this case; and without the requested Order, remaining documents and specimens may

otherwise be discarded pursuant to the standard policies and procedures of the Office of the Chief Medical Examiner for the State of Oklahoma.

Counsel for the Chief Medical Examiner, Assistant Attorney General John M. Crittenden, has approved this motion; his signature is attached. No one has any objection to the release of these documents, samples, specimens, etc., provided there is a Court Order directing such release as required by Okla. Stat. tit. 63, §§ 939 and 949.

WHEREFORE, the parties request that this Court enter an Agreed Order directing the Office of the Chief Medical Examiner to produce and permit inspection and copying of all documents in the Medical Examiner's Case File – including, but not limited to, the sampling of the tissue samples, slides, blood samples, photographs, and videos, if applicable – concerning the death of Kaylyn Gatlin. On or before fourteen (14) business days after entry of the Agreed Order, such materials should be released to the following:

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- (2) E. Todd Tracy
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Respectfully submitted:

/s/ Andrew G. Counts

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